

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

THE COLEMAN COMPANY, INC.,
Plaintiff/Counterclaim Defendant,
v.
TEAM WORLDWIDE CORPORATION,
Defendant/Counterclaim Plaintiff,
and
CHENG-CHUNG WANG,
Counterclaim Plaintiff.

C.A. No: 2:20-cv-351-RGD

**PLAINTIFF/COUNTERCLAIM DEFENDANT THE COLEMAN
COMPANY, INC.'S RESPONSE TO MOTION TO SEAL (ECF NO. 153)**

Plaintiff/Counterclaim Defendant The Coleman Company, Inc. (“Coleman”), by counsel and pursuant to Local Civil Rule 5(C), submits this response to the Motion to Seal filed by Defendant/Counterclaim Plaintiff Team Worldwide Corporation (“TWW”) at ECF No. 153.

Coleman has no objection to the **UNSEALING** of TWW’s unredacted opposition to Coleman’s Motion for Summary Judgment and the accompanying Exhibit B, which is an excerpt of the deposition testimony of one of Coleman’s experts, Professor Wayne Li. Coleman has not designated Professor Li’s opinion testimony in that deposition excerpt as “Attorneys Eyes Only” under the Protective Order, and Coleman has publicly filed Professor Li’s opening expert report in support of its Motion for Summary Judgment. (See ECF No. [135-5](#)).

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of November, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

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